

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:20-cr-20029
Judge: Hood, Denise Page
MJ: Whalen, R. Steven
Filed: 01-23-2020 At 03:56 PM
SEALED MATTER (af)

D-1 TOMMIE ROBERTSON,
a.k.a. "Tommie Bristol Robertson,"
a.k.a. "Tommie Brian Robertson,"
a.k.a. "Tommy Robertson,"
a.k.a. "Unc,"

D-2 GILBERT GONZALEZ,

D-3 SEAN FREEMAN,

D-4 WINDER DARBY, JR.,

D-5 WYATT ROBERTSON,

D-6 LARRY LEDFORD,

Defendants.

_____/.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846, 841(a)(1)) – Conspiracy to Possess with Intent to Distribute
and to Distribute Controlled Substances)

D-1 TOMMIE ROBERTSON,
a.k.a. “Tommie Bristol Robertson,”
a.k.a. “Tommie Brian Robertson”
a.k.a. “Tommy Robertson,”
a.k.a. “Unc,”

D-2 GILBERT GONZALEZ,

D-3 SEAN FREEMAN,

D-4 WINDER DARBY, JR.,

D-5 WYATT ROBERTSON,

D-6 LARRY LEDFORD

From in or about December 2014 through in or about December 2019, said
dates being approximate, in the Eastern District of Michigan and elsewhere,
Defendants TOMMIE ROBERSTON, GILBERT GONZALEZ, SEAN
FREEMAN, WINDER DARBY, JR., WYATT ROBERTSON, LARRY
LEDFORD and others known and unknown to the Grand Jury, did knowingly,
intentionally and unlawfully combine, conspire, confederate and agree with one
another to possess with intent to distribute and to distribute controlled substances,
namely a mixture or substance containing a detectable amount of fentanyl (a

Schedule I Controlled Substance) and a mixture or substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

D-1 TOMMIE ROBERTSON – with respect to Defendant Tommie Robertson, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, and a quantity of a mixture or substance containing a detectable amount of fentanyl, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

D-2 GILBERT GONZALEZ - with respect to Defendant Gilbert Gonzalez, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, and a quantity of a mixture or substance containing a detectable amount of fentanyl, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

D-3 SEAN FREEMAN - with respect to Defendant Sean Freeman, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1

kilogram or more of a mixture or substance containing a detectable amount of heroin, and a quantity of a mixture or substance containing a detectable amount of fentanyl, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

D-4 WINDER DARBY, JR. - with respect to Defendant Winder Darby, Jr., the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, and a quantity of a mixture or substance containing a detectable amount of fentanyl, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

D-5 WYATT ROBERTSON - with respect to Defendant Wyatt Robertson, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, and a quantity of a mixture or substance containing a detectable amount of heroin and fentanyl, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

D-6 LARRY LEDFORD - with respect to Defendant Larry Ledford, the amount involved in the conspiracy attributable to him as a result of his own

conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of a mixture or substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

(18 U.S.C. §§ 1956(a), 1956(h) – Conspiracy to Launder Monetary Instruments)

D-1 TOMMIE ROBERTSON,
a.k.a. “Tommie Bristol Robertson,”
a.k.a. “Tommie Brian Robertson”
a.k.a. “Tommy Robertson,”
a.k.a. “Unc,”

D-6 LARRY LEDFORD

From in or about December 2014 through in or about December 2019, said dates being approximate, in the Eastern District of Michigan and elsewhere, Defendants TOMMIE ROBERTSON, LARRY LEDFORD and others known and unknown to the Grand Jury, did knowingly combine, conspire, and agree with one another and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, namely to conduct and attempt to conduct financial transactions, knowing that the property involved in said transactions represents the proceeds of some form of unlawful activity and which in fact involves the proceeds of specified unlawful activity, namely conspiracy to distribute controlled substances,

with the intent to promote the carrying on of that conspiracy and knowing that the transaction is designed in whole or in part to conceal and disguise the nature, source, ownership and control of the proceeds of that controlled substances conspiracy; all in violation of Title 18, United States Code, Sections 1956(h), 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

CRIMINAL FORFEITURE ALLEGATIONS
(18 U.S.C. § 982(a)(1), 21 U.S.C. § 853(a))

Upon conviction of a controlled substance violation of Title 21, United States Code, Sections 841 and/or 846, as alleged in Count One of this Indictment, the defendant(s) shall forfeit to the United States, pursuant to 21 United States Code, Section 853(a): (1) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations; and (2) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation. Upon conviction of a money laundering violation of Title 18, United States Code, Section 1956, as alleged in Count Two of this Indictment, the defendant(s) shall forfeit to the United States, pursuant to 18 United States Code Section 982(a)(1), any property, real or personal, involved in the offense, or any property traceable to such property.

Such property includes, but is not limited to:

- \$99,670 in United States Currency;
- 2007 BMW 650i, VIN WBAEK13557CN84351;
- 2012 Porsche Panamera, VIN WP0AA2A74CL014639; and
- 2013 Ford F150, VIN 1FTFW1ET8DKE49809.

Forfeiture Money Judgment: Such property also includes, but is not limited to, a forfeiture money judgment against the defendant(s) in an amount to be determined, representing the total value of all property subject to forfeiture, as described herein.

Substitute Assets: Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1)-(2), each defendant shall forfeit substitute property, up to the value of the properties identified for forfeiture, if, by any act or omission of the defendant, the properties identified for forfeiture cannot be located upon the exercise of due diligence; have been transferred or sold to, or deposited with, a third party; have been placed beyond the jurisdiction of the court; have been substantially diminished in value; or have been commingled with other property which cannot be divided without difficulty.

All in accordance with Title 21, United States Code, Section 853 and/or
Title 18, United States Code, Section 982, and Federal Rule of Criminal Procedure
32.2.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

/s/ Julie A. Beck
Chief, Drug Task Force

/s/ David J. Portelli
DAVID J. PORTELLI

/s/ Brandon Helms
BRANDON HELMS

/s/ Michael El-Zein
MICHAEL EL-ZEIN

Assistant United States Attorneys
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-9100
e-mail: dave.portelli@usdoj.gov
e-mail: brandon.helms@usdoj.gov
e-mail: michael.el-zein@usdoj.gov

Dated: January 23, 2020

Case:2:20-cr-20029
 Judge: Hood, Denise Page
 MJ: Whalen, R. Steven
 Filed: 01-23-2020 At 03:56 PM
 SEALED MATTER (af)

United States District Court
 Eastern District of Michigan

Criminal Case Cov

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>QJP</i>

Case Title: USA v. Tommie Robertson, et al.

County where offense occurred : Wayne and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 23, 2020
 Date

David J. Portelli

David J. Portelli
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9711
 Fax: (313) 226-5464
 E-Mail address: Dave.Portelli@usdoj.gov
 Attorney Bar #: P40688

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.